

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE:
ANGELA RENEE LEWIS**

**CASE NO. 18-14121
CHAPTER 7**

MOTION TO AVOID NONPOSSESSORY, NONPURCHASE MONEY LIEN

COME(S) NOW the Debtor(s), by and through counsel, and files this Motion to Avoid Nonpossessory, Nonpurchase Money Lien of 1st Franklin Financial pursuant to 11 U.S.C. § 522(f) and Federal Rules of Bankruptcy Procedure 4003(d) and 9014 and for cause will show as follows:

1. The Debtor(s) exempted certain household goods of the type set forth in 11 U.S.C. § 522(f)(1)(B), as listed on Schedule C filed by the Debtor in this bankruptcy case.
2. The existence of the Creditor's nonpossessory, nonpurchase money lien against the Debtor(s)' property impairs exemptions to which the Debtor is entitled to under Title 85, Chapter 3 of the Mississippi Code and 11 U.S.C. § 522(b).

WHEREFORE the Debtor(s) pray(s) that the lien of Creditor, 1st Franklin Financial, be avoided and extinguished as to Debtor(s)' exempt property.

Respectfully submitted this the 8th day of May, 2019.

/s/ Miranda Linton Williford
Miranda Linton Williford

Miranda Linton Williford
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CERTIFICATE OF SERVICE

I, Miranda Linton Williford, Attorney for the above listed Debtor(s), do hereby certify that I have this day mailed by U.S. Mail, postage prepaid, true and correct copies of the Motion to Avoid Lien to the Registered Agent for 1st Franklin Financial at the address listed below. I further certify that I have delivered via electronic notification a true and correct copy of the foregoing Motion to Avoid Lien to the Chapter 7 Trustee and the United States Trustee at the email addresses listed below.

1st Franklin Financial
c/o James P Smith III
1811 W Main St, Ste D
Tupelo, Ms 38803

Henry J. Applewhite
happlewhite@applewhitelaw.com, happlewhite@ecf.epiqsystems.com

U.S. Trustee: USTPRegion05.AB.ECF@usdoj.gov

THIS the 8th day of May, 2019.

/s/ Miranda Linton Williford
Miranda Linton Williford

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